

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

MICROSOFT CORPORATION, OPENAI, INC.,  
OPENAI LP, OPENAI GP, LLC, OPENAI, LLC,  
OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI  
CORPORATION, LLC, OPENAI HOLDINGS,  
LLC,

Defendants.

No. 1:23-cv-11195-SHS-OTW

**DEFENDANTS' MOTION FOR LEAVE TO FILE UNDER SEAL**

Pursuant to Section IV of this Court's Individual Practices in Civil Cases, OpenAI Defendants ("OpenAI") seek leave to file under seal the following documents:

- Limited portions of OpenAI's concurrently filed response to Plaintiff's Letter Motion to Compel application of additional search terms that reference confidential materials;
- Limited portions of Exhibit A to OpenAI's response to Plaintiff's Letter Motion to Compel, comprising an annotated spreadsheet of search terms requested by Plaintiff and OpenAI's objections to those search terms; and
- Limited portions of Exhibit E to OpenAI's response to Plaintiff's Letter Motion to Compel, comprising the Declaration of Jeff Lewis.

For the reasons stated in OpenAI's accompanying memorandum of law, which is also submitted in support of OpenAI's Response to Plaintiff's Motion for Leave to File Under Seal (Dkt. No. 227), and articulated in more detail in the supporting declaration, OpenAI respectfully requests the Court grant its motion for leave to file under seal.

Dated: August 30, 2024

Respectfully Submitted,

By: /s/ Vera Ranieri

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